



PROGRESS REPORT NO. 175

TO: Robert Tan, U.S. Environmental Protection Agency (EPA) – via Electronic mail
Bonnie Arthur, EPA – via Electronic mail

FROM: Denise Mills, Teck American Incorporated (TAI)

Cc: Kris McCaig, TAI – via Electronic mail
Rob Orr, TAI – via Electronic mail

DATE: February 8, 2021

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) – Progress Report No. 175 Month Ending January 2021

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES):

The third-party data validator completed validation of the analytical results for the Phase II bench-scale testing time point 3 (t3) soil samples, which were collected at the end of the bench testing on March 11, 2020. As of this writing, TAI is preparing the validated Phase II dataset for transmittal to EPA in early 2021. All bench test results will be incorporated into the draft Phase II Data Summary Report (DSR) currently being prepared for the study. These data will also be evaluated in a statistical analysis report that will discuss results of the bench-scale testing and effects of the soil treatments tested in the lab. The Phase III amendment application to the SATES test plots and the initial Phase IV soil sampling event will be completed in Spring 2021, as documented in the EPA-approved Work Plan Change Request No. 2.

Baseline Ecological Risk Assessment (BERA):

Soil Toxicity Reference Values (TRVs) – TAI provided a draft technical memorandum to EPA on September 18, 2020, which summarized the results of implementation of the soil TRV development approach Steps 1 through 6, as described in the “Final Approach for Evaluating the Potential for Metals Toxicity to Plants and Invertebrates in the Baseline Ecological Risk Assessment (May 2019).” EPA provided comments on the draft technical memorandum in a letter delivered to TAI via electronic mail on November 9, 2020. TAI provided a letter to EPA, dated December 18, 2020, that confirmed the Upland Baseline Ecological Risk Assessment will address input received from EPA and provided additional clarification. EPA provided a letter, dated January 15, 2021, which provided additional clarification on EPA’s November 9, 2020 letter.

2019 Phase 3 Sediment Study:

2019 Phase 3 Sediment Study DSR – TAI submitted the draft DSR to EPA for review and comment on December 23, 2020 and is awaiting comments from EPA.

Bioassay Testing – In addition to data previously provided by EPA, via the U.S. Geological Survey Columbia Environmental Research Center (CERC), for the Phase 3 bioassay split sample program, CERC provided total recoverable metals data to EPA and TAI on January 8, 2021 and, as of this writing, CERC provided total organic carbon data from the bioassay split samples on February 2, 2021. Following a call between EPA and TAI in December regarding quartz sand bioassay auxiliary control sample results from Pacific EcoRisk, CERC sent quartz sand and reference samples to ALS on January 7, 2021 and January 27, 2021, respectively, for total recoverable metals and total organic carbon analysis. TAI continued evaluation of the auxiliary control sample results through the month.

Human Health Risk Assessment – TAI submitted additional documentation on the operation, maintenance, and performance of the Columbia Gardens air quality monitoring station provided by Teck Metals Ltd. to EPA on January 29, 2021, in response to EPA’s November 9, 2020 request for the additional information.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4515.